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Christopher K. Kamon

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

United States of America
Plaintiff,
v.
Christopher K. Kamon,
Defendant.

CASE NO.: 2:22-MJ-04385

**DECLARATION OF RICHARD
STEINGARD IN SUPPORT OF
DEFENDANT CHRISTOPHER K.
KAMON'S MEMORANDUM IN
SUPPORT OF PRE-TRIAL RELEASE
AND PROPOSED BOND CONDITIONS**

Date: December 28, 2022
Time: 9:00 A.M.

1 I, Richard Steingard, declare and state as follows:

2 1. I am an attorney with the Law Offices of Richard M. Steingard . I
3 previously served as counsel for Defendant Christopher K. Kamon (“Defendant” or
4 “Mr. Kamon”) in this matter. I am a member of the California bar. I make this
5 declaration in support of Mr. Kamon’s Memorandum in Support of Pre-Trial Release
6 and Proposed Bond Conditions. I have personal knowledge of the facts set forth herein,
7 and, if called to testify, I could and would do so competently as to the matters set forth
8 herein.

9 2. On March 31, 2021, I spoke with Chris Catizone, an Assistant U.S.
10 Attorney in the Northern District of Illinois. I had previously been advised that Mr.
11 Catizone was one of the prosecutors assigned to the criminal investigation of the
12 Girardi Keese law firm. I asked Mr. Catizone whether the government considered Mr.
13 Kamon a witness, subject, or target of their investigation. Mr. Catizone stated that at
14 that juncture, he could not provide me with a witness/subject/target description for Mr.
15 Kamon.

16 3. On April 2, 2021, I followed up with Mr. Catizone via email. In that
17 email, I once again asked whether Mr. Catizone could provide me with a
18 witness/subject/target description for Mr. Kamon. I also wrote that I was prepared to
19 discuss a potential interview of Mr. Kamon by Mr. Catizone. I provided Mr. Catizone
20 with my cell phone number. A copy of this email is attached hereto as Exhibit 1.

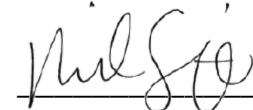
21 4. I did not have any further communications with Mr. Catizano or anyone
22 from the government. At no time did Mr. Catizone, or anyone from the United States
23 Attorney’s Office, inform me that Mr. Kamon was a target of any investigation.

24 5. At no time did Mr. Catizone, or anyone from the United States Attorney’s
25 Office, follow up on my offer to schedule a meeting with Mr. Kamon.

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1 I declare under penalty of perjury under the laws of the United States of America
2 that the foregoing is true and correct to the best of my knowledge.

3 Executed on December 20, 2022, in Los Angeles, California.

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5 _____
6 Richard Steingard

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Exhibit 1

From: Richard Steingard
Sent: Friday, April 2, 2021 11:00 AM
To: christopher.catizone@usdoj.gov
Subject: Chris Kamon

Mr. Catizone,

As you will recall, we spoke on March 30, 2021, regarding my client, Chris Kamon. At that time, I explained to you that the Trustee in the Girardi Keese bankruptcy matter was seeking to have Mr. Kamon designated as a substitute for the debtor who could attend a 341(a) creditor's meeting and answers questions. As I advised, if so designated, Mr. Kamon, on the advice of counsel, will assert his 5th Amendment rights and decline to make a statement or answer questions. On that basis, we filed the attached Opposition to the Trustee's motion, which includes my declaration of our conversation. If you believe any part of it is inaccurate, pls advise and we can discuss.

Additionally, I am still interested in Mr. Kamon's designation—witness, subject, target. You previously mentioned a desire to interview Mr. Kamon. We can discuss that as well.

Thank you and I look forward to hearing from you. My contact information is below but I can best be reached on my cell, 213-880-4792.

Richard Steingard

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